Case 3:18-cv-00797-JSC Document 55 Filed 08/16/19 Page 1 of 5

1 2 3 4 5	WILLIAM J. COOPER (SBN 304524) erichmond@conradmetlitzky.com wcooper@conradmetlitzky.com CONRAD & METLITZKY LLP Four Embarcadero Center, Suite 1400 San Francisco, CA 94111 Telephone: 415-343-7100		
6	Attorneys for Plaintiff Sierra Club		
7	UNITED STATES DISTRICT COURT		
8	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
9	SAN FRANCISCO DIVISION		
10			
11	SIERRA CLUB,	No. 18-cv-00797-JSC	
12	Plaintiff,	STIPULATION AND	
13	3 v.	[PROPOSED] ORDER CHANGING TIME	
14	UNITED STATES DEPARTMENT OF INTERIOR,	CHARGING TIME	
15			
16			
17	7		
18	3		
19			
20			
21			
22			
23			
24			
25			
26			
27			
28	5		
	II		

STIPULATION AND [PROPOSED] ORDER CHANGING TIME

18-CV-00797-JSC

11

12

8

13 14 15

16

17

22

23

24

25 26

27 28

Plaintiff Sierra Club and Defendant U.S. Department of Interior, through undersigned counsel, hereby stipulate, pursuant to Local Rule 6-1(b), to extend the deadline for the filing of the parties' joint status report to <u>August 27, 2019</u>, two days before the August 29, 2019 status conference, as follows:

- 1. In this Freedom of Information Act action, the Court has routinely ordered the parties to file joint status reports two days before each scheduled status conference.
- 2. On July 12, 2019, following the July 11 status conference, the Court entered an order setting the deadline for the next joint status report to be served on August 22, 2019, one week before the August 29, 2019 status conference (Dkt. No. 53).
- 3. In accordance with the past practice of the parties and Court in this matter, the parties agree to extend, and respectfully request that the Court extend, the deadline for the joint status conference statement now due on August 22 to August 27, 2019. The extended deadline will (1) allow the parties to continue ongoing meet-and-confer discussions about the outstanding issues in advance of the status conference; (2) allow Sierra Club more time to review produced documents before the conference; and (3) provide the Court with a more current update of the status of the cases.
- 4. The Parties further agree, and respectfully request that the Court order, that for purposes of efficiency, the parties may file a single joint status report for this case and the related case (Sierra Club v. U.S. Dep't of Interior, case no. 19-cv-02838-JSC) rather than a separate case management statement in the new case, and may do so at all future status conferences for these two cases unless otherwise directed by the Court.

IT IS SO STIPULATED.

DATED: August 15, 2019 CONRAD & METLITZKY LLP

> /s/ Ellen M. Richmond ELLEN M. RICHMOND Attorneys for Plaintiff

1	DATED: August 15, 2019	DAVID L. ANDERSON
2	5 -,	United States Attorney
3		/s/ James A. Scharf JAMES A. SCHARF Aggistent United States Attorney
4		Assistant United States Attorney Attorneys for Defendant
5		
6 7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
	18-CV-00797-JSC	-3- STIPULATION AND [PROPOSED] ORDER CHANGING TIME
	10-01-00/7/-300	STILOLATION AND [LKOLOSED] ONDER CHANGING HIME

[PROPOSED] ORDER RELATING CASES All Parties have stipulated to extend the deadline for the status conference statement, currently due August 22, 2019 (Dkt. No. 53), to <u>August 27, 2019</u>. The Parties have further stipulated that for purposes of efficiency, the parties may file a single joint status report for this case and the related case (Sierra Club v. U.S. Dep't of Interior, case no. 19-cv-02838-JSC) rather than a separate case management statement in the new case, and may do so at all future status conferences for these two cases unless otherwise directed by the Court. Having considered the parties' stipulation, and good cause appearing therefor, the deadline for the status conference statement, currently due August 22, 2019, is extended to August 27, The parties may file a single joint status report for this case and the related case (Sierra Club v. U.S. Dep't of Interior, case no. 19-cv-02838-JSC) at this and all future status conferences for these two cases unless otherwise directed by the Court. PURSUANT TO STIPULATION, IT IS SO ORDERED. Acqueline Statt ory Dated: August 16, 2019 , 2019

ECF FILER'S ATTESTATION I, Ellen Richmond, am the ECF user whose identification and password are being used to file this document. I hereby attest that concurrence in the filing of the document has been obtained from each of the signatories hereto. Dated: August 15, 2019 /s/ Ellen M. Richmond
Ellen M. Richmond